

David S. Rosenzweig, Esq.
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265 Franklin Street, Sixth Floor
Boston, MA 02110

BY FAX AND U.S. MAIL

RE: NSTAR Electric, D.T.E. 03-121

February 12, 2004

Dear Mr. Rosenzweig:

Enclosed please find the Department's second set of information requests on the above-captioned matter. Responses should be filed on or before February 26, 2004. Please do not wait for all answers to be completed before supplying answers, but instead provide the answers as they are completed. If you have any questions, please feel free to contact me at (617) 305-3620.

Sincerely,

William H. Stevens, Jr.
Hearing Officer

cc: Mary Cottrell
Staff as assigned
Joseph Rogers, Assistant Attorney General
Service List

Encl.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

SECOND SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
NSTAR ELECTRIC, D.T.E. 03-121

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company the following information requests with respect to the above captioned matter.

Instructions

The following instructions apply to this set of information requests and all subsequent information requests issued by the Department to Boston Edison Company in this proceeding.

1. "NSTAR Electric" or "Companies" means Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company, their officers, directors, employees, consultants, and attorneys.
2. "Companies' Filing" or "Filing" means all the documents NSTAR Electric filed in this proceeding.
3. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number, the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-hole punched paper.
4. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
5. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
6. The phrase "provide complete and detailed documentation" means provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.

Second Set of Department Information Requests

7. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
8. If the Company finds that any of these requests is ambiguous, please notify the hearing officer so that the requests can be clarified prior to the preparation of a written response.
9. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department. Please also submit the responses directly to: (1) William Stevens, Legal Division; (2) John Cope-Flanagan, Legal Division; (3) Jeff Hall, Rates and Revenue Requirements Division; (4) Claude Francisco, Rates and Revenue Requirements Division; (5) Sean Hanley, Rates and Revenue Requirements Division; and (6) Xuan Yu, Rates and Revenue Requirements Division.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

SECOND SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
NSTAR ELECTRIC, D.T.E. 03-121

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to NSTAR Electric the following information requests.

- DTE 2-01 In reference to the testimony of Henry C. LaMontagne ("LaMontagne testimony") at 2-4, please provide for Boston Edison Company ("Boston Edison"), Cambridge Electric Light Company ("Cambridge") and Commonwealth Electric Company ("Commonwealth") a copy of all standby service, supplemental service, maintenance service contracts approved by the Department from 1994 to the present.
- DTE 2-02 In reference to LaMontagne testimony at 6, please provide a copy of the Southern Energy Canal Back-Up Service Agreement, Dartmouth Power Back-Up Service Agreement, and Pilgrim Off-Site Power Agreement.
- DTE 2-03 Please provide a list of all customers currently taking service under Boston Edison's Short-Run Qualifying Facility Power Purchase Rate QF (M.D.T.E. No. 160). For each customer listed, provide a copy of the QF Power Purchase Agreement, and all amendments thereto, entered into between Boston Edison and the customer.
- DTE 2-04 Please provide a list of all customers currently taking service under Boston Edison's Power Purchase Rate P-2 (M.D.T.E. No. 161). For each customer listed, provide a copy of the QF Power Purchase Agreement, and all amendments thereto, entered into between Boston Edison and the customer.
- DTE 2-05 Please provide a copy of Boston Edison's Standards for Interconnection with Qualifying Facilities or On-Site Generating Facilities referred to in the existing tariff for rate P-2.
- DTE 2-06 Please provide a list of all customers currently taking service under Boston Edison's Interruptible Load Credit I-C tariff (M.D.T.E. No. 153). For each customer listed, provide:
- a) a copy of the Service Agreement, and all amendments thereto, entered into between Boston Edison and the customer;
 - b) the seasonal interruptible contract demand for years 1998 through 2003;
 - c) the minimum interruptible contract demand for years 1998 through 2003;
 - d) the seasonal amount of credit and penalties to each customer for years 1998 through 2003, providing supporting schedules that show how those credits and

penalties were calculated, including the applicable tariff charges and interruption options selected by the customer.

- DTE 2-07 Please provide a list of all customers currently taking service under Boston Edison's Interruptible Load Credit I-N tariff (M.D.T.E. No. 154). For each customer listed, provide:
- a) a copy of the Interruptible Service Agreement, and all amendments thereto, entered into between Boston Edison and the customer;
 - b) the seasonal interruptible demand for years 1998 through 2003;
 - c) the seasonal amounts of credit and penalties to each customer for years 1998 through 2003, providing supporting schedules that show how those credits and penalties were calculated, including the applicable tariff charges.
- DTE 2-08 Please provide a copy of Exhibit BEC-HCL-3 (Pre-RAD Rates and Unbundled Rate Design) of Boston Edison's reconciliation/true-up filings for years 1999 through 2003.
- DTE 2-09 Please provide the monthly non-coincident and coincident peak demand for Boston Edison's rate classes G-2, G-3, and T-2 for years 1998 through 2003.
- DTE 2-10 Please provide with supporting data and calculations the annual load duration curves for Boston Edison rate classes G-2, G-3, and T-2 for years 1998 through 2003.
- DTE 2-11 Please provide the number of customers taking service under Boston Edison's rate classes G-2, G-3, and T-2 for years 1998 through 2003.
- DTE 2-12 Please list and explain the reasons why Boston Edison's proposed standby rate SB-1 will be made available only to customers who qualify for service under Boston Edison's existing rates G-3 and T-2.
- DTE 2-13 Please list and explain the reasons why Boston Edison's proposed standby rate SB-2 will be made available only to customers who qualify for service under Boston Edison's existing rate G-2.
- DTE 2-14 Please list and describe each of the internal electric requirements as a basis for determining a customer's availability for Boston Edison's proposed standby rates SB-1 and SB-2.
- DTE 2-15 In reference to section 2 of the availability clauses for Boston Edison's proposed standby rates SB-1 and SB-2, please list and explain the reasons why rates SB-1 and SB-2 will be made available only to a customer whose generating units have

a combined nameplate rating of greater than 60 kW. Please indicate the required minimum kW nameplate rating, if any, for a generating unit in the customer's portfolio of generating units under these availability clauses.

- DTE 2-16 In reference to section 4 of the availability clause for Boston Edison's proposed standby rates SB-1 and SB-2, please:
- a) list and explain the reasons why these rates will be made available only to a customer who began satisfying all, or a portion of, its internal electric load requirements from its generation units after the effective date of the proposed tariffs;
 - b) identify any existing tariff of Boston Edison that would qualify as a standby tariff; if none, indicate whether the rationale, described in LaMontagne's testimony at 21 to "grandfather" existing standby customers with self generation, still applies for the availability clause noted in a) above.
- DTE 2-17 In reference to Boston Edison's proposed method for determining the customer's standby kW demand for rates SB-1 and SB-2 please:
- a) list and explain the reasons why the contract demand is based on the generating capability or the expected output of the customer's generation units;
 - b) indicate whether the contract demand so determined will be on a monthly, seasonal or annual basis;
 - c) explain the reasons for the use of the period identified in b) a above.
- DTE 2-18 In reference to Boston Edison's proposed standby tariff rates SB-1 and SB-2, at 2 and 3, please provide a version of each of the proposed tariffs indicating the charges per the "Applicable Rate Schedule" for standby delivery service and supplemental service charges.
- DTE 2-19 In reference to Boston Edison's proposed standby tariff for rate SB-1, at 3, please describe how the Company determined the 70 percent and 55 percent reductions of the monthly billing demand recorded during off-peak hours for rates G-3 and T-2, respectively.
- DTE 2-20 In reference to Boston Edison's proposed standby tariff for rate SB-2, at 3, please describe how the Company determined the 55 percent reduction of the monthly billing demand recorded during off-peak hours for rate G-2.
- DTE 2-21 In reference to Boston Edison's proposed standby tariffs for rates SB-1 and SB-2, at 5, please describe how the Company determined the 36 months prior written notice requirement from the customer in order to transfer to a non-firm standby service.

- DTE 2-22 Please list and explain the reasons why Boston Edison proposed two standby rates (SB-1 and SB-2) instead of one standby rate that would be available to qualified customers currently taking services under rates G-2, G-3, and T-2.
- DTE 2-23 Please provide a copy of Boston Edison's most recently approved marginal transmission and distribution costs studies and identify the marginal transmission and distribution unit costs for rates G-2, G-3, and T-2 indicated in those studies.
- DTE 2-24 Please calculate the long-run marginal distribution and transmission costs for rates G-2, G-3, and T-2 based on Department precedent and using more recently available data. Provide all supporting data and schedules and described the method and all assumptions used.
- DTE 2-25 Please provide a copy of Boston Edison's most recently approved allocated cost of service study and identify the embedded transmission and distribution unit costs for rates G-2, G-3, and T-2 indicated in that study.